



U.S. Department of Justice
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VIA ECF

March 17, 2021

Honorable Noel L. Hillman
United States District Judge
Mitchell H. Cohen Courthouse
One John F. Gerry Plaza
4th & Cooper Streets
Camden, NJ 08101

Re: United States v. Nicholas Martino
Civil No. 21-cv-0037 (NLH)

Dear Judge Hillman:

Defendant Nicholas Martino has filed a motion to correct, vacate, or set aside his federal sentence under 28 U.S.C. § 2255, and the Court has ordered the Government to respond to this motion by April 19, 2021. *See* Docket Entry Nos. 1, 4, 5, 6, 8.

The Government now requests a 60-day extension of time so that its response to Martino's motion may be due on or before June 19, 2021.¹

Thank you for your consideration of the Government's request for a 60-day extension.

Respectfully submitted,

RACHAEL A. HONIG
Acting United States Attorney

s/Sara Aliabadi
SARA A. ALIABADI
Assistant U.S. Attorney

¹ In so doing, the Government notes that Martino recently filed a motion for the Court to reconsider its prior denial of Martino's request for counsel and for discovery. *See* Docket Entry No. 9. This motion remains pending.